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12 ALEXANDRA MARWA SABER p/k/a DENIMS

13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**

16 TED ENTERTAINMENT, INC., a
17 California Corporation,

18 Plaintiffs,

19 v.

20 ALEXANDRA MARWA SABER
21 f/k/a MARWA TALATT
ABDELMONEM p/k/a DENIMS, an
individual, and DOES 1-10

22 Defendants.

23 Case No.: 2:25-cv-05564-WLH-PD

24 **DISCOVERY MATTER**

25 **JOINT STIPULATION RE:**
GRANTING PLAINTIFF LEAVE TO
SERVE THIRD-PARTY
SUBPOENAS PRIOR TO THE RULE
26(f) CONFERENCE

1 **WHEREAS**, plaintiff Ted Entertainment, Inc. (“TEI”) commenced this
2 action by filing its complaint (“Complaint”) on June 19, 2025 alleging: (1) direct
3 copyright infringement against defendant Alexandra Marwa Saber p/k/a Denims
4 (“Denims”); and (2) contributory copyright infringement against Does 1-10 (the
5 “H3Snark Mods”) (Dkt. No. 1);

6 **WHEREAS**, on June 24, 2025, Denims was served with the Complaint (Dkt.
7 No. 12);

8 **WHEREAS**, on June 30, 2025, counsel for Denims contacted counsel for
9 TEI to discuss various preliminary matters related to the present action;

10 **WHEREAS**, also on June 30, 2025, counsel for TEI responded to counsel
11 for Denims and explained, *inter alia*, TEI’s intention to file an *ex parte* application
12 seeking expedited discovery to subpoena Reddit, Inc. (“Reddit”) and Discord, Inc.
13 (“Discord”) to obtain personal identifying information of the H3Snark Mods prior
14 the conference of counsel under Federal Rule of Civil Procedure Rule 26(f) (the
15 “Application”) for the purpose of naming the H3Snark Mods in the Complaint and
16 serving the H3Snark Mods with the Complaint;

17 **WHEREAS**, also on June 30, 2025, counsel for Denims responded to
18 counsel for TEI and requested, *inter alia*, to set up a time to meet and confer
19 regarding the Application;

20 **WHEREAS**, counsel for TEI and Denims (collectively, the “Parties”) agreed
21 to meet and confer on July 1, 2025;

22 **WHEREAS**, on July 1, 2025, counsel for the Parties conducted a telephonic
23 meet and confer regarding the grounds and necessity for the Application;

24 **WHEREAS**, counsel for Denims agreed that TEI’s request to seek expedited
25 discovery from Reddit and Discord to obtain personal identifying information of
26 the H3Snark Mods to name them in the Complaint and serve the H3Snark Mods
27 with the Complaint is warranted under the circumstances;

28 **WHEREAS**, to avoid unnecessary motion practice and conserve the

resources of the Parties and this Court, the Parties have entered into this joint stipulation to request this Court to grant TEI leave to serve subpoenas on Reddit and Discord on condition that counsel for Denims first review the aforementioned subpoenas;

5 **WHEREAS**, due to a preplanned Fourth of July holiday vacation, the
6 earliest counsel for Denims could review the proposed subpoenas to Reddit and
7 Discord was July 10, 2025;

8 **WHEREAS**, on July 10, 2025, counsel for TEI sent counsel for Denims the
9 proposed subpoenas to Reddit and Discord – to which counsel for Denims does not
10 object;

11 **WHEREAS**, a true and correct of the proposed document subpoena to
12 Reddit is attached hereto and incorporated herein as **Exhibit A** (with the date and
13 time of compliance and date of the subpoena was issued left blank); and

14 **WHEREAS**, a true and correct copy of the proposed document subpoena to
15 Discord is attached hereto and incorporated herein as **Exhibit B** (with the date and
16 time of compliance and date of the subpoena was issued left blank).

17 **THEREFORE, IT IS HEREBY STIPULATED**, by and between the
18 Parties through their respective attorneys of record respectfully request that: (1) this
19 Court grant the Stipulation; (2) that TEI be granted leave to serve the proposed
20 subpoenas attached as Exhibit A to Reddit and Exhibit B to Discord prior to the
21 conference of counsel under Federal Rule of Civil Procedure Rule 26(f); and (3) the
22 Court enter the Order lodged concurrently herewith.

23 || Dated: July 16, 2025

HEAH BAR-NISSIM LLP

By /s/ Rom Bar-Nissim
ROM BAR-NISSIM
Attorneys for Plaintiff Ted
Entertainment, Inc.

1 Dated: July 16, 2025
2

FROST LLP

3 By /s/ Ben Kassis
4 BEN KASSIS
5 BENJAMIN GRUSH
6 Attorneys for Defendant
7 Alexandra Marwa Saber p/k/a
8 Denims

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10 Pursuant to Civil L.R. 5-4.3.4(a)(2)(1), the filer attest that all other
11 signatories listed, and on whose behalf this filing is submitted, concur in the filing's
12 content and have authorized the filing.
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